

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	CASE NO 1:16-MJ-4082
)	
Plaintiff,)	MAGISTRATE JUDGE
)	NANCY A. VECCHIARELLI
vs.)	
)	<u>DEFENDANT'S UNOPPOSED MOTION</u>
)	<u>TO MODIFY TERMS OF BOND</u>
DANIEL J. MERCEDE,)	
)	
Defendant.)	
)	

Now comes Defendant Daniel J. Mercede, by and through undersigned counsel, and respectfully moves this Court to modify the terms of his bond, as set forth below.

On May 24, 2016, Mr. Mercede appeared before this Court for a bond hearing after having been arrested on charges relating to identity theft activities. The Court granted Mr. Mercede bond on the conditions that his parents provide security of \$250,000.00, that he participate in home detention and electronic monitoring, and that he reside at his parents' home in Chagrin Falls. The Court also restricted Mr. Mercede from having contact with his fiancée, Alicia Thompson, based on the possibility that she may have had some involvement in the alleged activities as well.

Subsequent to the May 24th bond hearing, Mr. Mercede retained the undersigned new counsel and has not violated the conditions of his bond. Mr. Mercede anticipates cooperating fully with the United States Attorney's Office to resolve this matter and assist the government in any way possible. To date, Mr. Mercede has provided the government with passwords for all computers and devices seized by the government,

and undersigned counsel are working to schedule dates for Mr. Mercede to meet with government officials to assist in their ongoing investigation.

Mr. Mercede's separation from his fiancée and her five-year-old son has been very difficult on the three of them. At this time, Mr. Mercede respectfully requests that the terms of his bond be modified to permit him to have contact with Ms. Thompson and her son. Mr. Mercede and Ms. Thompson wish to marry each other and the terms of the bond prohibit them from doing so. Undersigned counsel has discussed this matter with government counsel. Government counsel has no objection to this request, so long as all other terms of the bond remain the same, specifically that Mr. Mercede continue to reside at his parents home in Chagrin Falls. Mr. Mercede commits to complying with the Government's request that Mr. Mercede and Ms. Thompson are not to engage in any discussions with each other regarding the case.

WHEREFORE, Mr. Mercede respectfully requests that this Court grant this motion, thereby permitting Mr. Mercede and Ms. Thompson to marry each other and reside together at Mr. Mercede's parents' home in Chagrin Falls.

Respectfully submitted,

/s/ Richard H. Blake

Richard H. Blake (0083374)

Jennifer D. Armstrong (0081090)

McDonald Hopkins LLC

600 Superior Avenue, East – 21st Floor

Cleveland, OH 44114

Phone: (216) 348-5400

Fax: (216) 348-5474

rblake@mcdonalddhopkins.com

jarmstrong@mcdonalddhopkins.com

Counsel for Daniel J. Mercede

CERTIFICATE OF SERVICE

I hereby certify that on July 5, 2016, the foregoing **Defendant's Unopposed Motion to Modify Terms of Bond** was filed electronically. Notice of this filing will be sent to the parties by operation of the Court's electronic filing system.

/s/ Richard H. Blake

RICHARD H. BLAKE (0083374)
McDonald Hopkins LLC

Counsel for Daniel J. Mercede